

## Section 5 - Providing housing and neighbourhoods

Change Reference Number	Policy, para	Type of change	Proposed change
C62	Paragraph 5.1	Minor	Paragraph 5.1 ..... <u>Considerable progress has already been made to achieving these goals. It is expected that by the end of 2019 about 11,000 24,000 homes will have been built within the Legacy Corporation area. by 2034 With future planned development this figure is expected to reach 33,000 by 2036.</u>
C63	Objective 2	Minor	<b>Objective 2</b> Delivering more than <del>24,000</del> <u>22,000</u> new homes <u>between 2020 and 2036</u> within a range of sizes, <u>types</u> and tenures  The delivery of at least <del>four</del> <u>two</u> new primary schools <u>and one new secondary school.</u>
C64	Strategic Policy SP.2	Major	Strategic Policy SP.2 The Legacy Corporation will work with its partners to maximise opportunities for delivering high-quality, sustainable and affordable homes <u>within a variety of types and tenures</u> and provision of supporting infrastructure through:  1. Delivering in excess of the <u>Draft New London Plan target of 1,471 2,161</u> housing units per annum <u>through, of which a minimum of 455 will be affordable</u> <u>optimising housing delivery on suitable and available sites</u>  2. <u>Maximising affordable housing delivery through a minimum 35 per cent target across the area and applying the Mayor's threshold levels of 35 per cent and 50 per cent on a habitable room basis (see Draft New London Plan Policy H6)</u>  3. Providing for <u>a full range of</u> identified size, <u>accommodation</u> and tenure requirements, <u>particularly including</u> family housing in all tenures, <u>Providing</u> specialist housing and specific housing products which contribute towards the overall housing mix and meet identified requirements
C65	Paragraph 5.2	Minor	Paragraph 5.2 The Legacy Corporation has an annual housing delivery target, set out within the London Plan. This

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			has been developed by the Greater London Authority (GLA), on the basis of its Strategic Housing Land Availability Assessment, <del>2013</del> <u>2017</u> , and robust assessment of housing needs within its Strategic Housing Market Assessment, <del>2013</del> <u>2017</u> . The Legacy Corporation fully supports this housing delivery target and will seek to achieve and exceed this through the application of this policy.
C66	Paragraph 5.3	Minor	<p>Paragraph 5.3</p> <p>This target will be achieved through a range of sources, including large identified sites, non-self-contained accommodation (including <del>hostels and</del> student accommodation, <u>shared living</u>), <del>an annualised through delivery on small sites and through conversions potential of 33 units</del><sup>18</sup> and reuse of long-term vacant properties. <u>Where appropriate, the Legacy Corporation will also support innovative means of site-assembly to support housing delivery, including for example, longer-term over-station development. Where appropriate, custom/self-build opportunities shall also contribute towards the housing supply where all Local Plan requirements are met and the site is optimised for housing delivery.</u> Figure 9, the housing trajectory, shows the ability to deliver housing against the housing target over the Plan period. <del>It shows that within the last five years delivery is less certain; however, London Plan targets will be reviewed by 2019/2020. The trajectory includes a</del> <u>The five per cent buffer of deliverable sites which is expected to will be met for the first five years, but it may not be possible on a rolling five-year basis past 2028/2029. The London Plan recognises the difficulty of this approach.</u><sup>19</sup> <del>Nonetheless, it is expected that the cumulative housing target is expected to be exceeded, with more than 24,000</del> <u>22,000</u> homes <u>will be delivered over the Plan period of 2020 to 2036 through optimised housing delivery on suitable, available and achievable sites over the period. the creation of additional capacity and greater delivery on small sites than anticipated within the London SHLAA.</u></p>
C67	Paragraph 5.3	Major	<p><b>Becomes Paragraph 5.4</b></p> <p>The Legacy Corporation will monitor and keep under review progress in seeking to achieve and where possible exceed the housing target, in particular against potential sources contained within <u>each part of the draft New London Plan target (i.e. small, large sites and non-self-contained)</u> <del>Policy 3.3. Where relevant it will introduce</del> <u>introducing</u> measures to</p>

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			<p>enhance delivery on all applicable sites, including <u>optimising delivery on sites within the Legacy Corporation's ownership through the portfolio-based approach, update updating evidence and design codes, investigate investigating capacity requirements or amend amending targets where required. The quantum and timescale of development are subject to change. The Legacy Corporation will also work with the boroughs through the Duty to Cooperate to develop and devise a joined-up strategic approach to housing delivery and in particular to meet delivery targets towards the latter part of the plan period where, as shown within the housing trajectory within Figure 9 below, delivery becomes less certain. Where relevant these discussions should also cover the transition arrangements or the transfer of those powers to a future relevant body.</u> The trajectory and the list of key sites available in Appendix 2 will be kept under review within the Authority Monitoring Report (AMR), with delivery rates reflected within the rolling five year target.</p>
C68	Paragraph 5.4	Minor	<p><b>Becomes Paragraph 5.5</b>  <del>The London Plan Policy 3.11 allows flexibility in setting the affordable housing target in terms of how this is calculated and demonstrated; the Legacy Corporation has set the target in absolute terms, which has been calculated by removing non-self-contained accommodation<sup>20</sup> from the housing target and apportioning the remainder by using the 35 per cent benchmark (see Policy H.2), i.e. <math>1,471 - 171 \times 35\% = 455.21</math> This should be achieved across the area, and will be subject to review to reflect changing market conditions. The draft New London Plan (2017) sets out an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity. It also sets out the requirement for an equivalent of 35 per cent affordable delivery on non-self-contained residential accommodation therefore monitoring will be based upon the proportion of affordable housing achieved over the monitoring year, rather than against an absolute figure. For the avoidance of doubt, in accordance with draft New London Plan policy H13 and the Affordable Housing and Viability SPG this applies to Build to Rent tenures as well as traditional, build for sale. Policies H.1 and H.2 provide further detail in relation to housing mix and affordable housing requirements. Delivery will be reported annually in the AMR.</del></p>

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C69	Paragraph 5.5	Minor	<b>Becomes Paragraph 5.6</b> Protecting existing residential stock is also a key component of mixed and balanced communities. Loss of residential units, including affordable housing, floorspace or land <u>essential to housing delivery</u> will be resisted. Self-contained units or floorspace will be protected or re-provided unless unacceptable amenity issues are present. Residential land will only be released where an equivalent number of residential units or floorspace is re-provided across all applicable sites.
	Paragraph 5.6	No change	<b>Becomes Paragraph 5.7</b>
C70	Figure 9	Minor	Figure 9 New trajectory, the amended figure presented at the end of this section.
C71	Policy H.1: Providing a mix of housing types	Major	<b><u>Policy H.1: Providing for and diversifying the housing mix</u></b> <del>a mix of housing types</del>  <u>The Legacy Corporation will seek to diversify the range of housing provision by securing an appropriate mix of housing and accommodation types to meet identified requirements. It will promote and diversify delivery on a range of different site types including through small sites and conversions by utilising tools such as the Characterisation Study, the Brownfield Register and PTAL mapping to identify potential locations for yielding additional housing capacity. This information will be kept up to date within the Authority Monitoring Report.</u>  <u>All residential Residential proposals, including schemes utilising Built to Rent models should:</u> 1. Meet identified local and strategic requirements, containing a mix of one-, two- and three-bedroom units <del>and larger</del> , with units of two bedrooms and more constituting more than half the total; 2. Integrate a mix of unit <u>and tenure types</u> including flatted developments, <u>maisonettes</u> and family <u>houses housing</u> into the design; 3. <del>Have no unacceptable adverse impacts on</del> <u>Promote the creation of mixed and inclusive communities</u> <del>the mix and balance of the proposed area; and</del> 4. Meet London Plan and applicable Housing SPG design considerations, subject to Policy BN.4.

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			<p><u>Schemes on small sites and conversions will be supported where:</u></p> <ol style="list-style-type: none"> <li>5. <u>the site is well-designed to optimise housing delivery;</u></li> <li>6. <u>the proposal is in accordance with all relevant policies of the Local Plan, including loss of open space, social infrastructure and employment floorspace capacity; and</u></li> <li>7. <u>there is no unacceptable loss of amenity.</u></li> </ol> <p><u>Where Built to Rent and other similar rental products are proposed, accommodation will be required to utilise unified ownership and management structures; include mechanisms to secure the accommodation as such for the long term, with appropriate clawback procedures, including options for long-term secured tenancies.</u></p>
C72	Paragraph 5.7	Minor	<p><b>Becomes Paragraph 5.8</b></p> <p><u>Providing for a range of different forms of residential accommodation by dwelling sizes and types size, form, tenure and typology is essential to create sustainable new mixed and inclusive communities and meet identified housing requirements. neighbourhoods and to avoid problems which may arise from over-concentration of certain sizes and types of accommodation. For this reason, a range of sizes to meet identified requirements and different configurations of accommodation will be sought. The principal aim is to achieve mixed and balanced communities. Build to Rent accommodation is playing an increasing role providing additional assurances to that normally found within the private rented sector through flexible tenancies, greater certainty over rent rises and a managed approach to the whole development. In combination, this approach should help enable residents to remain in the area for the longer term, contributing to community cohesion.</u></p>
C73	New paragraph	Major	<p><b>Becomes Paragraph 5.9</b></p> <p><u>The draft New London Plan emphasises the potential contribution of small sites towards overall housing delivery, however due to the constrained nature of the area the contribution from small sites and conversions is likely to be comparatively small. Nonetheless measures are being introduced to boost delivery from these sources. Should small sites delivery fall below the anticipated 80 units per annum from year 6 onwards (2025) the Legacy Corporation or responsible body should consider the use of more prescriptive design codes setting out what forms of small site delivery may be appropriate.</u></p>

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C74	Paragraph 5.8	Major	<p><b>Becomes Paragraph 5.10</b></p> <p><del>Evidence</del> <u>The Housing Requirements Study (2018) suggests that there is a particularly high local requirement for the following types of housing size: two bedroom market homes and, within the affordable sector, for two and three bedroom homes. The Greater London Authority SHMA (2017) identifies a greater strategic need for low cost rented properties, in particular for one-bedroom properties.</u></p> <ul style="list-style-type: none"> <li><del>• One-bedroom properties within market and affordable/social rented</del></li> <li><del>• Two-bedroom properties in market housing</del></li> <li><del>• Larger units (of three bedrooms or more) particularly within affordable/social rented and low-cost home ownership sectors.</del></li> </ul>
C75	Paragraph 5.9	Major	<p><b>Becomes Paragraph 5.11</b></p> <p>All proposals should reflect these identified size, form and tenure requirements, providing an appropriate balanced mix of one-, two- and three-bedroom units, <del>including within affordable tenures.</del> <u>Provision of low cost rented units should provide an equal mix of one, two and three-bedroom properties.</u> All proposals should contain more two-bedroom-plus units than one-bedroom units, and should not avoid the provision of any single size or tenure. When considering the detailed mix of dwelling sizes, the Legacy Corporation will consider individual site circumstances, including location, viability and the <del>maintenance</del> <u>promotion</u> of mixed and <u>inclusive balanced</u> communities. Proposals which cluster units of a particular size and tenure and do not reflect these requirements will not be permitted. In all cases, proposals should show how the provision of family housing has been maximised.</p>
C76	New Paragraph	Major	<p><b>Paragraph 5.12</b></p> <p><u>The Legacy Corporation will apply the Mayor's definition of Build to Rent (BTR) as set out within Policy H13 of the draft New London Plan which includes schemes of more than 50 units, covenanted for at least 15 years and containing specific management measures. This generally includes proposals for a number of units which are purpose-built, or redeveloped for rent, normally by an institution or management company within the private sector to individuals, groups or families who do not share specialist-use requirements (i.e. excluding student and older persons' accommodation). The Legacy Corporation will utilise S106 agreements and</u></p>

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			<u>conditions to secure Build to Rent provision. Alike traditional build for sale proposals, schemes containing BTR will be expected to provide a mix of dwelling types and sizes.</u>
C77	Paragraph 5.10	Minor	<b>Becomes Paragraph 5.13</b> Where appropriate and viable, units intended for family housing should be within a mix of flatted development <del>and traditional houses or maisonettes.</del> Consideration should also be given to <u>different living requirements and lifestyles such as how developments can be designed to suit the lifestyles of large family groups, including layouts with kitchens separate from other living space and, for example to support home working practices.</u>
C78	Paragraph 5.11	Major	<b>Becomes Paragraph 5.14</b> Proposals shall be supported which address existing stock imbalances by introducing market and intermediate housing within existing predominantly social rented areas or those which introduce affordable rented accommodation where currently under-represented, provided that they meet an identified local housing need. A mixed and <u>inclusive neighbourhood balanced community</u> will generally be considered to reflect roughly the local demographic norms in relation to tenure, age structure and income and enable people to remain within the community for the long term. Where the Legacy Corporation considers that a proposal could impact negatively on mixed and <u>inclusive neighbourhoods balanced communities</u> , or harm the residential amenity, character or function of the area, additional justification of the need for the development should be provided in the form of local studies, waiting lists, business cases for the development and potential economic repercussions, should the proposal not take place.
C79	Paragraph 5.12	Major	<b>Becomes Paragraph 5.15</b> The Legacy Corporation is directed by the London Plan on a range of housing policies which will be applied including: play space, residential amenity, daylight and sunlight, accessibility and safety design principles. Policies BN.4 and <del>BN.5 sets out how the Baseline Standards within the Mayor's Housing SPG will be applied alongside optional requirements and the Nationally Described Space Standards – Technical Requirements will be applied.</del> <u>The London Plan's density matrix is a useful tool, referencing Public Transport Accessibility Levels (PTAL) for determining densities; however, All proposals,</u>

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			<p>including self/custom-build will be expected to <u>optimise housing delivery on deliverable sites, when considering the appropriate density, the Legacy Corporation will consider individual site circumstances including: location, constraints, transport accessibility, connectivity and capacity; management, occupancy and tenure of the development; and contribution of the site to the Legacy Corporation's convergence aims. Schemes referable to the Mayor will also be required to undergo design review through the Quality Review Panel and submit a Management Plan where the density thresholds as set out in Draft New London Plan Policy D6 are triggered.</u></p>
C80	New para	Minor	<p><b>Paragraph 5.16</b>  <u>The housing trajectory sets out the anticipated delivery rates, but does not include an allowance from small sites for the first five years as delivery rates from these sources are currently considerably below these levels. However it is anticipated that delivery from these small sites can be increased by applying the principles of this new policy approach. The Characterisation Study, 2018 identifies the character of each part of the sub area and highlights broad locations which can potentially yield residential capacity from small sites, defined as less than 0.25ha or through residential conversions. Other locations within PTAL levels 3 to 6 are also considered broad locations of search. Residential proposals will be supported where they are of a suitable scale and design, have no unacceptable impacts on amenity and meet all other Local Plan policies.</u></p>
C81	New para	Major	<p><b>Paragraph 5.17</b>  <u>The Legacy Corporation will also seek to identify further opportunities to boost small site delivery through promoting brownfield sites and utilising the Brownfield Register. The previous 0.25 threshold has been amended to invite sites capable of delivery of more than 5 homes. The Call for Sites process of the Brownfield Register will remain open and the list will be reviewed regularly, at least on an annual basis.</u></p>
C82	New para	Major	<p><b>Paragraph 5.18</b>  <u>Other potential sources of residential capacity will come from conversions of other uses to residential. Due to other Local Plan policies protecting employment floorspace capacity for example, and the amount of development taking place within the area it is not anticipated that this form of development will yield any significant new capacity. The Legacy Corporation will monitor within the Authority</u></p>



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			<p><u>Monitoring Report and keep under review the amount of capacity coming forward from small sites and conversions, introducing measures to enhance delivery where necessary such as further detailed housing capacity work and design codes.</u></p>
C83	Case Study 3	Minor	<p><b>Case Study 3: Chobham Farm – Housing Mix</b>  The Chobham Farm site is located to the east of the Legacy Corporation area. It is adjacent to the railway line and part of it is situated on former Strategic Industrial Land currently within industrial use. The site has outline planning permission for up to 1,036 units. The first phase of the development is for mixed-use development: six buildings between three and ten storeys providing 173 residential units (Use Class C3) and 1,161 sqm of commercial floorspace (Use Class A1–A3, B1, D1 and D2) plus car and cycle parking. The residential density of development in this phase is 680 habitable rooms per hectare.  The proposed mix of the first phase is well balanced, with family units of larger three- and four-bedroom units occupying approximately a third of the units. This mix meets demand identified within the Strategic Housing Market Assessment Review (2013) for three-bed units, with 30 per cent of the affordable units being family dwellings and the whole of the scheme is structured in favour of two- and three-bed units, rather than one-bed units.  In terms of the affordability mix, this is also in favour of units with more than two bedrooms, and only 14 per cent of the affordable units are one-bed properties, with more than half of these being affordable rent.  The later phases of the proposal, permitted in outline, are also biased in favour of family housing units, with the scheme as a whole delivering approximately 43 per cent of units with more than three bedrooms. The viability of the latter phases of the development will be re-assessed to secure the maximum viable proportion of affordable units which has been set out within the terms of the Section 106 Agreement.</p> <p><b><u>Case Study 3: Housing Mix 52-54 White Post Lane</u></b></p> <p><u>This scheme is located in Hackney Wick but just outside the boundary of the Hackney Wick Masterplan site. This is a mixed-use redevelopment containing around 2,400 sqm of employment floorspace plus 55 residential units. The proposed mix of the scheme is</u></p>

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			<p><u>well balanced with 34.5% 1 beds, 34.5% 2 beds and 31% 3 beds. This conforms to the Local Plan policy aspiration of a 'balanced mix'.</u></p>
C84	Policy H.2 Delivering Affordable housing	Major	<p>Policy H.2: Delivering Affordable housing Affordable housing will be <del>maximised</del> <u>sought</u> on sites capable of providing ten units or more <del>and over 1,000sqm combined floorspace</del> <u>or has an area of 0.5 hectares or more, based on the affordable housing thresholds set out within SP.2, broken down as 60 per cent <u>low cost rented Affordable Rent and Social Rent</u>, and 40 per cent intermediate</u> <small>[Footnote- NPPF 10% low cost home ownership should be included within this category].</small>, <del>.,</del> <u>The Legacy Corporation will apply the Mayor's Fast Track and Viability Tested Routes and thresholds to maximise affordable housing delivery, including utilising viability re-appraisal where relevant. The following shall be considerations for maximising provision:</u></p> <ol style="list-style-type: none"> <li><del>1. Identified needs and tenure requirements</del></li> <li><del>2. Affordable housing targets and delivery rates</del></li> <li><del>3. The need to facilitate development</del></li> <li><del>4. Viability including phased viability re-appraisal.</del></li> </ol> <p><u>For self-contained residential schemes, affordable housing should be delivered on site in the first instance. Off-site provision will only be considered where it:</u></p> <ol style="list-style-type: none"> <li><del>1. 5. Provides equivalent number and type of affordable units across all sites related to the proposal;</del></li> <li><del>2. 6. Does not prejudice the delivery of affordable housing;</del></li> <li><del>3. 7. Is delivered at no financial advantage to developer;</del></li> <li><del>4. 8. Is linked to the completion of the market housing elements of the scheme;</del></li> <li><del>5. 9. Is located where able to provide for local housing needs; and</del></li> <li><del>6. 10. Would be beneficial to achieve and maintain mixed and balanced communities.</del></li> </ol> <p>Financial contributions will only be acceptable when on-site provision and all potential off-site options have been fully explored and discounted, and linked to a particular site or proposal. <u>Other specific policies of the Local Plan set out where contributions towards off-site provision of affordable housing are appropriate.</u></p>

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C85	Paragraph 5.13	Minor	<p><b>Becomes Paragraph 5.19</b></p> <p>Providing for housing needs including through different affordable tenures is crucial to achieving mixed and <u>inclusive neighbourhoods</u> <del>balanced communities</del>. For this reason, a proportion of total housing delivery will be within affordable tenures. This has been set as a <del>minimum</del> target of 35 per cent of affordable homes across the whole of the Legacy Corporation area <u>and 50% on public owned land and as set out within Policy H6 of the draft New London Plan. Where residential is proposed within designated and non designated industrial sites and there will be a net loss of industrial floorspace capacity, 50% affordable housing is expected or the VTR will be utilised.</u> This <u>target and tenure mix</u> has been determined according to evidence and subject to rigorous viability testing <sup>[2018 Affordable Housing Viability testing]</sup> to determine viability across the whole of the area. <del>This should be used as a minimum and will be used to commence discussions on individual schemes. In relation to the affordable housing tenure split requirements, the draft New London Plan sets out that 30 per cent shall be provided as low cost rented homes and 30 per cent intermediate products, with the remainder to be determined by the local planning authority through the Development Plan process. As local and strategic evidence confirms a higher need for low cost rented accommodation, within the Legacy Corporation area the remaining 40 per cent shall normally be provided as 30/10 in favour of low cost rented. When determining the detailed affordable housing mix the intermediate offer should also meet the 10% low cost home ownership requirement of the NPPF, where relevant.</del> <sup>[Footnote- exclusions for solely for Build to Rent schemes, specialist accommodation for a group of people with specific needs, by people who wish to build or commission their own homes; or is exclusively for affordable housing]</sup>.</p>
C86	Paragraph 5.14	Major	<p><del>Affordable rent is a relatively new product, where eligibility is based upon local incomes and local house prices rather than local authority lists alone. Affordable rent is intended to address similar types of need to that within traditional social housing. Half of the affordable rented product will include rental rates capped to ensure the requirements of those most in need are met (similar to those within local authority nomination lists). For the remainder within the 'discounted' level, this should have typical rents of no more than 80 per cent of market value, including service charge. This level is broadly achievable across the area.27</del></p>

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C87	Paragraph 5.14	Major	<p><b>Becomes Paragraph 5.20</b></p> <p><u>The Mayor has set out appropriate income caps for his preferred intermediate tenures of London Living Rent and London Shared Ownership which will be applied. In relation to affordable housing allocations the Legacy Corporation will follow the approaches of the four Boroughs. In practice, the Legacy Corporation is not setting specific local rental caps, but will expect developers and registered providers to agree the proposed rental levels, maintained as low as possible, based on meeting local Borough needs, benefit caps and maximising output. The Mayor's annual London Affordable Rent benchmarks shall be used as the starting point for setting appropriate rental rates, and other similar products should also demonstrate similar levels of affordability. Developers will be expected to demonstrate that they have engaged with a registered provider and secured a commitment for provision from the outset. Subject to the availability of appropriate funding, delivery of social rented accommodation within the area will be supported. Affordable housing should maximise larger, family type housing. Affordable accommodation should be indistinguishable externally from other tenures.</u></p>
C88	Paragraph 5.15	Major	<p><b>Becomes Paragraph 5.21</b></p> <p><u>Policy H.2 will apply to all residential schemes over 10 units or more or on sites of over 0.5 hectares, including future changes of use of residential floorspace. Proposals which provide affordable housing at the relevant threshold as set out within SP.2 without public subsidy, meet the 60/40 tenure mix requirement as above and all other Local Plan policy requirements can qualify for the Fast Track Route (FTR). All other proposals shall be assessed under the Viability Tested Route (VTR). This will mean that the scheme's viability will be tested at the application stage, and further viability testing will be secured via As scheme viability can vary across its lifetime, to ensure affordable housing is maximised, the Legacy Corporation will utilise Section 106 Agreements using the formula and the process set out within the Mayor's Affordable Housing and Viability SPG to secure early, mid and late stage reviews (as appropriate). Viability re-appraisal will also be secured within FTR schemes for circumstances where an agreed level of progress has not been met within two years to ensure that proposals within phased development re-appraise viability prior to each</u></p>

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			<p><del>subsequent phase of the development. Outcomes of the re-appraisal may result in additional affordable housing provision within later phases. For Build To Rent schemes to qualify for the FTR the tenure mix should consist entirely of Discounted Market Rent with 60 per cent being offered at a discount equivalent to London Affordable Rent, 30 per cent as London Living Rent and the remainder offered at equivalent rates to other intermediate housing offers. All other tenure mixes will be subject to the VTR. In accordance with the draft New London Plan Estate regeneration schemes should go through the VTR. Policy H.2 will apply to all residential schemes over 10 units or more or over 0.5 hectares, including future changes of use of residential floorspace.</del></p>
C89	New para	Minor	<p><b>Paragraph 5.22</b>  <u>Where affordable housing is provided as dedicated blocks within a larger scheme the affordable housing units should be appropriately located across the site, avoiding parts of the site which may be more constrained or less accessible. Affordable accommodation should be indistinguishable externally from other tenures.</u></p>
C90	H.3: Meeting accommodation needs of older person households	Minor	<p>H.3: Meeting accommodation needs of older person households  Net loss of older persons' accommodation will only be acceptable where it is unsuitable or below relevant standards and incapable of meeting standards at reasonable expense. The Legacy Corporation will support provision of new specialist older persons' accommodation <u>within C2 or C3 use classes</u> which will be acceptable where:</p> <ol style="list-style-type: none"> <li>1. Suitably located in relation to transport modes, <u>social infrastructure</u> and Centres;</li> <li>2. Meeting identified strategic needs for the <del>tenure and specialist</del> type of accommodation;</li> <li>3. Meeting a local need for the level of care provided within the accommodation;</li> <li>4. It meets <u>accessible and inclusive design and other relevant standards</u> for the type of accommodation; and</li> <li>5. Delivery of non-specialist housing is not compromised.</li> </ol> <p><u>Self-contained C3 accommodation should also provide affordable housing in accordance with Policy H.2.</u></p>

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C91	Paragraph 5.16	Minor	<p><b>Becomes Paragraph 5.23</b></p> <p>The average age in the Legacy Corporation area is set to increase over the Plan period, but with a younger population than within other parts of London. Nonetheless, evidence suggests that there is a <u>strategic London-wide need for specialist accommodation within all use classes and tenures</u> [Reference Older Londoners and the London Plan: Looking to 2050]. <u>as well as a small local need</u> <del>but most of the strategic needs for older persons' accommodation mainly for come from C3 accommodation with varying types of specialism and support those within the C3 Use Class and owner occupation tenures.</del><sup>29</sup> [Housing Requirements Study, 2018].</p> <p>Policies will ensure that needs for specialist older persons' accommodation can be met. <u>Generally C3 accommodation will be considered self-contained sheltered or extra care accommodation whereas C2 accommodation will be residential sheltered care homes with a significant level of care such as healthcare, domestic help or emergency support. For the purposes of clarification, non-self-contained older person's accommodation will be monitored on the basis of 3 bedspaces accounting for a single home.</u></p>
C92	Paragraph 5.17	Minor	<p><b>Becomes Paragraph 5.24</b></p> <p>All types of older persons accommodation should meet National Minimum Standards for Care Homes for Older People or be designed for the needs of future occupants, <u>including specifically for dementia care</u>, staff and visitors while maintaining flexibility of tenure, in accordance with the Design Principles for Extra Care Housing, 2008. Existing accommodation shall only be lost where these design standards are incapable of being met through re-configuration of the accommodation. This will be assessed by the cost of work to meet standards and specialist viability appraisal.<sup>31</sup> Identified increased strategic and local needs for older persons' accommodation mean it is unlikely that a case for a lack of need for specialist older persons' accommodation can be proven. <u>Proposals involving changes of use between different forms of older person's accommodation should demonstrate changing local requirements for the level of care and utilise viability appraisals to maximise affordable housing.</u></p>
C93	Paragraph 5.18	Minor	<p><b>Becomes Paragraph 5.25</b></p> <p>The Legacy Corporation does not have an indicative benchmark target within the London Plan; however, it will seek to provide accommodation to meet strategic and local requirements. To enable occupants of specialist accommodation to carry out day-to-day</p>

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			tasks, proposals should be located within easy access of public transport, <u>social infrastructure</u> and Centres, as defined within Table 4 3.
C94	Paragraph 5.19	Minor	<p><b>Becomes Paragraph 5.26</b></p> <p>Provision should align closely with requirements, so the Legacy Corporation will seek to ensure that specialist, and sometimes high-cost, accommodation does not compromise the overall delivery of housing requirements. Proposals should therefore demonstrate how the development meets the strategic need within east London for the tenure and type of <u>specialist accommodation, including accommodation suitable for people with dementia</u>. Proposals for <u>accommodation with an element of care should demonstrate</u> and local requirements for the <u>specific type and level of care</u>. This will be key for accommodation where the level of care is minimal, e.g. retirement complexes. Methods of demonstrating local need should include <u>local demographic information</u>, waiting lists, survey information and demand information from similar developments within a nearby equivalent area. <u>Proposals for new C2 accommodation should also submit business models and management plans to demonstrate the ability to deliver and manage the development for the long-term</u>. Specialist viability appraisal will be expected to take into account the distinct economics of specialist accommodation provision.</p>
C95	New para	Minor	<p><b>Paragraph 5.27</b></p> <p><u>New C3 older persons accommodation should deliver a minimum of 35% affordable housing in accordance with Policy H.2, or be assessed through the Viability Tested Route. Given that almost half of the total requirement is for Leasehold Schemes for the Elderly (LSE) the tenure split for affordable older person's accommodation should be balanced in favour of shared ownership products.</u></p>
C96	Case Study 4	Minor	<p><b><del>Case Study 4: Stratford Halo, 150 High Street, Stratford</del></b></p> <p><del>Older persons' accommodation within a mixed and balanced community</del></p> <p><del>The development as a whole won Inside Housing's 'Development of the Year (large schemes)' award 2013, and has delivered 65 extra-care units sitting alongside market and affordable rented, HomeBuy, outright sales, commercial, business and workshop space. The scheme is a good example of how introducing older persons' accommodation to a</del></p>

Change Reference Number	Policy, para	Type of change	Proposed change
			<p><del>scheme can contribute to mixed and balanced communities by providing a range of tenures and introducing a population diverse in terms of income levels.</del></p> <p><del>The developers worked in partnership with Newham Adult Social Care team to deliver the variety of different care services in one extra-care scheme. Residents have the use of dedicated outside space, as well as that for the development as a whole. This provides a safe environment for vulnerable residents, as well as encouraging integration. It also provides a number of learning opportunities for residents, including IT classes, arts and crafts, music therapy and coaching skills.</del></p> <p><b><u>Case Study 4: Older persons' housing, William Guy Gardens</u></b></p> <p><u>This scheme completed in 2016 involved the redevelopment of a vacant older persons housing development to provide a total of 41 units for the over 50's including associated communal and private amenity space, hard and soft landscaping and disabled car parking. It provided 36 affordable dwellings and 5 market dwellings for the over 50's age group, involving a net increase of 28 older persons' units.</u></p>
C97	Policy H.4 Providing student accommodation	Minor/major	<p>Policy H.4 Providing student accommodation Net loss of student accommodation will be acceptable where the proposal meets identified requirements within the housing supply. Proposals for new <u>purpose-built student accommodation (PBSA)</u> should:</p> <ol style="list-style-type: none"> <li>1. <u>Secure</u> <del>Secures</del> the accommodation through planning agreement or condition for long-term student use and <u>be secured by nomination agreement for occupation by students of one or more identified Higher Education provider.</u> a) Establishes relationships with higher education institutions (HEIs) including where it is part of a wider scheme for a new HEI campus, and is available at an affordable rate; or b) Maximises affordable student provision according to viability where there is not an undertaking with a specified HEI</li> <li>2. Meet identified strategic needs for student accommodation <u>and be directed to appropriate locations within or on the edge of the Metropolitan Centre.</u> Proposals outside these</li> </ol>



Change Reference Number	Policy, para	Type of change	Proposed change
			<p><u>locations will be acceptable where they are suitably located for easy access by walking, cycling or public transport to the higher education provider/s to which the proposal is linked.</u></p> <p>3. Facilitate a positive balance of tenure and income in the locality and <del>has</del> <u>have</u> no unacceptable adverse amenity impacts; <del>and</del> <u>is</u> suitably located in relation to public transport and HEI/s; <del>and</del></p> <p>4. <u>Provide the maximum level of on-site affordable student provision, or assessed through the Viability Tested Route (VTR) (utilising the thresholds set out within paragraph 5.19) and be secured through a legal agreement.</u></p> <p>In locations where the proposal has the potential to impact negatively upon the aims of (3) <del>through over-concentration,</del> justification of the requirement for the development should be provided by additional local market need information.</p>
C98	Paragraph 5.20	Minor	<p><b>Becomes Paragraph 5.28</b></p> <p>The <u>draft New London Plan</u> specifies that there is a strategic need across London for new student bedspaces and provision of new <u>purpose-built student accommodation (PBSA) can contribute towards the overall supply of housing but</u> should be more dispersed. For this reason, the Legacy Corporation will ensure that student accommodation permitted within the area meets genuine student needs and is appropriate in location and that uses are integrated well into the wider environment through application of this policy. <u>For the purposes of clarification, PBSA will be monitored on the basis of 3 bedspaces accounting for a single home.</u></p>
C99	Paragraph 5.21	Minor	<p><b>Becomes Paragraph 5.29</b></p> <p>To ensure that the accommodation is provided at a rate affordable to current students, proposals should be linked to <u>one or more</u> established higher education providers <del>institutions (HEIs) or</del> <u>and</u> secured for long-term student use through Section 106 Agreement or conditions. <del>If these links are not established, rental levels should be kept low, subject to specialist viability testing, through maximising the number of units available to students at rates equivalent to affordable provision tied to London HEIs.</del> Proposals shall only be determined under this policy where they will be</p>

Change Reference Number	Policy, para	Type of change	Proposed change
			robustly secured for students through <u>Higher Education Provider HEI</u> links, conditions or a Section 106 Agreement, <u>or where all the bedspaces qualify as affordable student accommodation.</u> In all other cases, it shall be subject to the requirements of Policy H.2: Affordable housing, and any other relevant policies within this Local Plan.
C100	Paragraph 5.22	Minor	<p><b>Becomes Paragraph 5.30</b></p> <p><u>The Metropolitan Centre and edge of centre sites within the northern zone of the Stratford Policy Area (see Policy 3.1) are considered most appropriate for PBSA due to the enhanced public transport accessibility, the location of existing and future higher education providers and the ability of the proposals to add to the diversity and vitality of the centre. However</u></p> <p><del>By its nature, the student population is transient, so proposals in all locations should ensure that this does not impact negatively on the long-term sustainability of the community. In areas of existing high provision, most notably within the vicinity of Stratford, proposals should consider carefully their impact on the management of the night time economy, including crime and safety and the impact on mixed and balanced communities inclusive neighbourhoods and where necessary justified through, justifying the proposal through</del> additional local market need information. This may include consideration of <del>planning permissions and delivery against the apportionment of student accommodation within the annual housing target of 171 per annum (see SP.2), HEI higher education provider waiting lists, survey information and demand information from similar developments within the area.</del> 5.23 All proposals should demonstrate how potential for noise, disturbance and amenity impacts will be minimised through a management scheme, <del>as well as be located within a short walking distance of public transport or HEIs</del></p>
C101	Paragraph 5.23	Deletion	<p><del>All proposals should demonstrate how potential for noise, disturbance and amenity impacts will be minimised through a management scheme, as well as be located within a short walking distance of public transport or HEIs.</del></p>
C102	New para	Minor	<p><b>Paragraph 5.31</b></p> <p><u>The draft New London Plan expects non-self-contained schemes such as student accommodation to contribute to the supply of affordable housing. Any new proposals should therefore provide a minimum of 35% on-site affordable student bedspaces available at</u></p>

Change Reference Number	Policy, para	Type of change	Proposed change
			<p><u>a rate affordable to students on maximum state-funded financial support (defined by the Mayor's Annual Monitoring Report and appropriately indexed in later years) or be rigorously assessed through the VTR. Proposals located on public land, or on industrial sites where there is a net loss of industrial capacity should provide at least 50% affordable student rooms to follow the FTR. Affordable student provision should be equivalent to all other bedspace provision by nature of the design, size and services provided, with nominations managed by the relevant higher education provider. Any future proposed change of use will trigger a full Viability Review to maximise affordable housing.</u></p>
C103	New para	Major	<p><b>Paragraph 5.32</b>  <u>The Legacy Corporation will expect the submission of information demonstrating how the population density of the proposal compares to that of similar housing schemes meeting the Local Plan housing mix requirements as set out in Policy H.1. Where the population density is above that of equivalent schemes and there are considered to be sufficient additional impacts on transport or infrastructure demand compared to other conventional housing schemes, for example for healthcare facilities, or a substantial increase in footfall, further S106 contributions may also be sought for mitigation of impacts. The use of student accommodation for other ancillary uses within the vacation period will only be acceptable where the accommodation is offered to conference delegates, university interns, and short course students at an equivalent daily rate to that charged the student occupants of the accommodation. Where acceptable occupancy conditions will be secured through conditions or S106 agreements.</u></p>
C104	H.5: Location of gypsy and traveller accommodation	Minor	<p>Policy H.5: Location of gypsy and traveller accommodation  The Legacy Corporation will seek to provide for the needs of gypsies and travellers generated within its area through working strategically with neighbouring boroughs and co-operating <u>and engaging</u> with gypsy and traveller communities to allocate <u>and deliver</u> suitable sites.</p>
	Paragraph 5.24	No change	<b>Becomes Paragraph 5.33</b>

Change Reference Number	Policy, para	Type of change	Proposed change
C105	Paragraph 5.25	Major	<p><b>Becomes Paragraph 5.34</b></p> <p><del>Evidence suggests that there is a net requirement for between ten and 19 nine gypsy and traveller pitches within the Legacy Corporation area over the Plan period to 2036 plus a need for an additional 15 pitches arising from households falling within the draft New London Plan definition, but do not meet the planning definition defined within the Planning Policy for Traveller Sites (2015). The first five-year, needs-based pitch target amounts to between six and 13 pitches. The existing site at Chapman Road shall be is safeguarded for gypsy and traveller accommodation uses to continue to contribute a supply of five pitches over the Plan period. Although site assessments<sup>35</sup> have concluded that there are no suitable, available and achievable sites to meet the identified needs over the Plan period, an audit of open space has identified that the Local Open Space designation at Bartrip Street South has minimal value and functionality and so has been removed from designation.<sup>36</sup> The allocated site at Bartrip Street South is expected to be able to provide around nine new pitches therefore it has the potential to meet the needs of households who meet the planning definition over the plan period to 2036. This means that this site has potential to contribute towards the pitch requirements and so has been allocated for gypsy and traveller use (see Allocation SA1.9). This site is only expected to be able to meet the lower end of the first five-year pitch target of up to approximately nine pitches. It is not yet known how the identified needs for 15 pitches for households who fall outside the planning definition over the whole of the Plan period will be met. In order to do so the Legacy Corporation will continue to cooperate with neighbouring authorities to explore potential to meet need associated with its area at a strategic level. The Legacy Corporation will therefore identify and update on an annual basis the availability of sites to meet the first five years' supply of sites against the pitch target; identify specific sites or broad locations of sites to meet supply for years 6 to 10, and thereafter; and monitor performance against these targets and review Local Plan Policy H.5 if these aims are not being met by 2018/19.</del></p>
C106	Paragraph 5.26	Minor	<p><b>Becomes Paragraph 5.35</b></p> <p>Where any additional sites can be identified for potential gypsy and traveller use within the area, suitability will be assessed on the same grounds as housing in general, including deliverability and</p>

Change Reference Number	Policy, para	Type of change	Proposed change
			<p>developability tests. <u>Where small gypsy and traveller sites are proposed, proximity to existing sites to ensure the cohesion of the gypsy and traveller community will be considered positively.</u> The policy criteria shall be used to assess proposals for potential sites within the plan-making and development management processes where potential arises. The Legacy Corporation will monitor any unmet need through the monitoring and review process which will include updating evidence, investigating capacity requirements or amending targets where required and will cooperate with each of the <del>Growth</del> <u>four</u> boroughs to address wider strategic issues of accommodating need for gypsy and traveller accommodation once they have reached an appropriate point of review for their local plans. <u>On an annual basis the Legacy Corporation will also work with the four boroughs and other partners to audit existing pitches for overcrowding, capacity and refurbishment requirements</u> <del>Where small sites are proposed, proximity to existing sites to ensure the cohesion of the gypsy and traveller community will be considered positively.</del> <u>and will utilise the relevant borough's nominations process where new sites are provided.</u></p>
C107	Policy H.6: Houses in Multiple Occupation (HMOs)	Minor	<p>Policy H.6: Houses in Multiple Occupation (HMOs) Net loss of HMOs will only be permitted where an HMO is no longer required, is unsuitable or below standards, or is being replaced with housing meeting localised needs.</p> <p><u>Schemes equivalent to 10 residential units or 30 bedspaces and more will deliver a cash in lieu contribution towards the delivery of a minimum of 35% C3 affordable housing, or be subject to the Viability Tested Route.</u> Proposals for purpose-built HMOs and conversions requiring planning permission will be acceptable where:</p> <p><del>1. Maximising affordable housing according to viability;</del> <u>1. Meeting an identified local need;</u> .....</p>
C108	Paragraph 5.27	Minor	<p><b>Becomes Paragraph 5.36</b> <del>The importance of HMOs to the housing supply has been heightened by benefit reforms. Single households under 35 will now often require space in shared accommodation, as opposed to single person dwellings. It is considered that HMOs provide an</del> <u>important role in the housing supply, particularly to</u></p>

Change Reference Number	Policy, para	Type of change	Proposed change
			meet the needs of younger households. To maintain this important supply of low-cost housing, the Legacy Corporation will seek to protect HMOs which meet relevant standards and provide a high standard of new HMO accommodation.
C109	New para	Minor	<p><b>Paragraph 5.37</b>  <u>HMOs are defined within this policy as having at least 3 tenants living together to form one household, sharing washing and cooking facilities but let on a room by room basis, rather than as a single property. Large HMOs are over three storeys high with 5 tenants or more. HMOs do not normally provide any additional shared amenity or facilities, whether on-site or through off-site linked, or shared facilities. In accordance with the London Plan, HMOs, being non-self-contained should normally be monitored on a 3:1 basis. The affordable housing requirement will be triggered at 30 bedspaces, on this basis of this being equivalent to 10 residential units, and thus meeting the threshold as set out within Policy H.2. Any future proposed change of use will trigger a full Viability Review to maximise affordable housing.</u></p>
C110	Paragraph 5.28	Minor	<p><b>Becomes Paragraph 5.38</b>  New provision should meet relevant <u>housing space</u> standards as well as normal internal and residential amenity standards. Premises should be licensed, ensure mixed and balanced communities (see Policy H.1) and should not compromise the overall delivery of housing requirements. The Legacy Corporation shall monitor and enforce against any ‘beds in sheds’ and the impact of HMO provision through permitted development rights. <del>An Article 4 Direction will be considered if evidence suggests that there has been a substantial loss of family housing to HMOs.</del></p>
C111	Policy H.7: Large-scale investment in private rented sector	Major	<p><b>Policy requirements now included within Policy H.1 and supporting paragraphs</b></p> <p><del><b>Policy H.7: Large-scale investment in private rented sector</b></del></p> <p><del>New purpose-built private rented sector accommodation, including large-scale, long-term investment, will be supported where the proposal:</del></p> <ol style="list-style-type: none"> <li><del>1. Maximises affordable housing according to viability;</del></li> <li><del>2. Meets local and strategic needs;</del></li> </ol>

Change Reference Number	Policy, para	Type of change	Proposed change
			<p><del>3. Provides well-managed accommodation meeting high design standards; and</del></p> <p><del>4. Includes a mechanism to secure the accommodation as private rented for the long-term.</del></p>
C112	Paragraph 5.29	Major (Paragraphs removed but included within Paragraphs 5.5, 5.8, 5.12)	<p><del>Large-scale investment in the private rented sector as a concept can play an important role in meeting the housing needs of those who choose not to or are unable to afford to buy market homes. It also provides a supply of accommodation available for those who are in housing need and supported by benefits. Advantages of this provision are flexible tenancies, greater certainty over rent rises and a managed approach to the whole development, ensuring consistent quality. These assurances shall also enable residents to remain in the area for the longer term, contributing to community cohesion. Despite the planning system offering limited powers to influence provision, proposals for such accommodation which meet a number of criteria will be supported.</del></p>
C113	Paragraph 5.30	Major (Paragraphs removed but included within Paragraphs 5.5, 5.8, 5.12)	<p><del>In the context of this policy, the private rented sector (PRS) is considered to refer to proposals for a number of units which are purpose-built, or redeveloped for rent, normally by an institution or management company within the private sector to individuals, groups or families who do not share specialist use requirements (i.e. excluding student and older persons' accommodation).</del></p>
C114	Paragraph 5.31	Major (Paragraphs removed but included within Paragraphs 5.5, 5.8, 5.12)	<p><del>The Legacy Corporation acknowledges the viability implications of delivery of purpose-built private rented accommodation, as opposed to market sale, so specialist PRS viability appraisal, based on yield, shall be accepted when demonstrating how affordable housing provision has been maximised. In these circumstances, the Legacy Corporation will expect PRS provision to be covenanted<sup>40</sup> for long-term private rented sector use. The long-term management of PRS will be secured by condition.</del></p>

Change Reference Number	Policy, para	Type of change	Proposed change
C115	New Policy: shared living (H.7)	Major	<p><b><u>Policy H.7 Shared living accommodation</u></b>  <u>Proposals for large scale shared living accommodation should be directed towards the Metropolitan Centre or identified appropriate edge of Metropolitan Centre locations. Large scale and other smaller shared living proposals outside these locations should demonstrate the role of this form of accommodation in meeting identified housing requirements. Proposals will be acceptable where they:</u></p> <ol style="list-style-type: none"> <li>1. <u>Relate positively to the aim of mixed and inclusive neighbourhoods</u></li> <li>2. <u>Include suitable and secured management processes; and provide sufficient on-site facilities, services and amenity space in accordance with Draft New London Plan Policy H18, which should be appropriate to the scale, density and population of the proposed development;</u></li> <li>3. <u>Meet high residential design standards; and</u></li> <li>4. <u>Contribute financially towards the provision of off-site C3 affordable housing (for schemes of 30 bedspaces and above), equivalent to 35% of residential units within the proposal</u></li> </ol>
C116	New para	Major	<p><b>Paragraph 5.39</b></p> <p><b><u>Reasoned justification</u></b></p> <p><u>The extent of the need for housing across London in particular has facilitated the growth in new and alternative forms of accommodation which can contribute towards the overall supply. It is believed that shared living can play a key role in meeting housing delivery and provide a new product in demand across London, however it is important that proposals provide high standards of accommodation and are appropriately located, as well as contribute appropriately to the supply of affordable housing.</u></p>
C117	New para	Major	<p><b>Paragraph 5.40</b></p> <p><b><u>Policy application</u></b></p> <p><u>Shared living accommodation is defined within this policy as a non-self-contained residential development (demonstrably not C3) which do not meet minimum housing standards; delivered under single management; with tenancies of at least three months; containing on-site, or linked off-site shared communal</u></p>



Change Reference Number	Policy, para	Type of change	Proposed change
			<p><u>facilities encouraging shared interaction, above that required for washing and cooking; and which fall outside within the scope of policy H.6 (HMOs). Large-scale shared living is defined by the draft New London Plan as schemes containing 50 or more non-self-contained units as described above. All proposals for shared living should provide appropriately sized on-site communal services, facilities and amenity space, meet relevant design and management requirements as set out within Policy H18 of the new London Plan. Detailed justification of the ratio of bedroom space to services, facilities and amenity space should also be provided.</u></p>
C118	New para	Major	<p><b>Paragraph 5.41</b>  <u>The Metropolitan Centre is an appropriate location for large scale shared living proposals where the residential density can contribute towards the housing mix of town centre living and aid the vitality and viability of the centre. Edge of centre sites at the northern zone of Stratford High Street within the Stratford High Street Policy Area are also considered appropriate locations for large-scale shared living as the integrated non-residential elements of schemes will promote increased vitality along a street lacking in current identity (see Policy 3.1). Where large-scale proposals are considered to have a potential negative impact upon mixed and inclusive communities additional local need information may be sought and/or S106 funds secured for mitigation. Proposals for large scale or other shared living outside these locations will be expected to demonstrate that there is a genuine unmet demand for this accommodation through marketing and demand information from similar schemes across London and how the scheme contributes towards meeting localised housing requirements.</u></p>
C119	New para	Major	<p><b>Paragraph 5.42</b>  <u>For schemes of 30 bedspaces and above, proposals should deliver a cash in lieu contribution to C3 affordable housing, equivalent to at least 35 per cent of bedspaces (see Policy H.2 thresholds) at a 50% discount from the market rent. In accordance with the draft New London Plan this can be as a one-off payment or an on-going in perpetuity payment. All proposals will be assessed under the VTR and any future proposed change of use will trigger a full Viability Review to maximise affordable housing.</u></p>

Change Reference Number	Policy, para	Type of change	Proposed change
C120	New para	Major	<p><b>Paragraph 5.43</b>  <u>Shared living should be secured in perpetuity under single management and applications should include a Management Plan which will be secured through S106 or condition. This should ensure that the development is managed and maintained to ensure the quality of the development. Proposals for a conversion away from shared living or a change in configuration or quantum of the residential elements shall re-appraise affordable housing viability and clawback any additional requirement. Any proposed amendments to the use, terms or quantum of shared facilities should provide evidence that the facilities are no longer required, that the facilities can be lost or re-configured without negative impacts on the shared living offer or demand for such accommodation.</u></p>
C121	New para	Major	<p><b>Paragraph 5.44</b>  <u>For all proposals for shared living accommodation the Legacy Corporation will also expect the submission of information demonstrating how the population density of the proposal compares to that of similar schemes meeting the Local Plan housing mix requirements as set out in Policy H.1. Where the population density is above that of equivalent schemes and there are considered to be sufficient additional impacts on transport or infrastructure demand compared to other conventional housing schemes, for example for healthcare facilities, or a substantial increase in footfall, further S106 contributions may also be sought for mitigation of impacts.</u></p>
C122	New para	Major	<p><b>Paragraph 5.45</b>  <u>In accordance with the draft New London Plan, shared living accommodation of any size will be monitored on a 3:1 basis. Where any change in residential configuration is proposed, the impact on housing numbers will also be assessed to ensure changes are appropriately monitored, with a presumption against loss of residential accommodation.</u></p>
C123	New Policy	Major	<p><b>Policy H.8 Innovative housing models</b>  <u>Proposals for new innovative forms of residential accommodation or housing provision which fall outside the scope of policies H.3 to H.8 will be acceptable where they:</u></p> <ol style="list-style-type: none"> <li data-bbox="788 1966 1366 2029">1. <u>Relate positively to the aim of mixed and inclusive neighbourhoods;</u></li> </ol>

Change Reference Number	Policy, para	Type of change	Proposed change
			<ol style="list-style-type: none"> <li>2. <u>Demonstrably contribute towards the wider, strategic housing supply;</u></li> <li>3. <u>Meet an identified local need for the unique form of accommodation proposed, including where non-residential elements are included, or where the intended occupants have a shared set of characteristics with identified requirements which are unable to be met within the market;</u></li> <li>4. <u>Provide a minimum of 35% affordable housing on a habitable room basis or via the Viability Tested Route in accordance with Policy H.2. Off-site contributions towards C3 provision will only be acceptable where the scheme is Sui Generis and demonstrably not C3 accommodation;</u></li> <li>5. <u>Contain suitable management or investment model processes;</u></li> <li>6. <u>Are secured through the planning system for an appropriate time-period; and</u></li> <li>7. <u>Meet relevant residential design standards.</u></li> </ol>
C124	New para	Major	<p><b><u>Reasoned justification</u></b></p> <p><b><u>Paragraph 5.46</u></b>  <u>It is likely that new and innovative housing delivery models will continue to develop in order to meet accommodation demands. These products may be new or unique by the way they are developed, managed or in the final product itself. Through time it is also envisaged that new forms of living will continue to emerge from shifting perceptions of potential living solutions and to take account of technological changes in the process of designing and producing residential accommodation. This may also enable more wider community needs to be met, such as the potential for shared amenity space or facilitating home-based working.</u></p>
C125	New para	Major	<p><b><u>Paragraph 5.47</u></b>  <u>The form of innovation of a product could be by the level of self-containment; size of accommodation; flexibility or nature of use of space; lifetime of the scheme; occupancy; fit out; management or investment model; or a combination of the above. This policy sets out some key policy principles to help guide future proposals which are not covered by other specialist housing policies.</u></p>

Change Reference Number	Policy, para	Type of change	Proposed change
C126	New para	Major	<p><b><u>Policy application</u></b></p> <p><b>Paragraph 5.48</b>  <u>All proposals should demonstrate how they contribute to mixed and inclusive neighbourhoods and contribute to the supply of housing. Where any proposals are considered to have a potential negative impact upon mixed and inclusive communities S106 funds may be secured for mitigation. Proposals should clearly meet a defined need for the form and type of accommodation and should be located where conventional housing would also be acceptable. Information should be provided on how the proposal contributes towards the supply of housing across London, but also that it meets a clearly identified, specific need for the innovative nature of the product. Proposals should also demonstrate how they contribute towards wider policy aspirations such as economic growth, community infrastructure provision or enhance the cultural and creative sectors.</u></p>
C127	New para	Major	<p><b>Paragraph 5.49</b>  <u>To ensure a high quality of delivery the proposed product's form of innovation should be appropriately secured through the planning system. Dependent on the product this may be through use of management plans, occupancy conditions or for a specific time-period. Any innovative proposals for residential as an interim use should be secured for the relevant period and enable the re-use of materials on another site. Any innovative products provided at sub-market rates should be secured as such by legal agreement to prevent the scheme being used for investment purposes or short-term financial gain.</u></p>
C128	New para	Major	<p><b>Paragraph 5.50</b>  <u>Self-contained accommodation should provide affordable housing in accordance with Policy H.2 of the Local Plan on a habitable room basis. Under certain circumstances affordable housing may be calculated on a residential unit or floorspace basis. This may include, for example, where the innovative nature of the product relates to the level of internal specification or similar; or where the specialism relates to the shared characteristics of occupants.</u></p>
C129	New para	Major	<p><b>Paragraph 5.51</b>  <u>Where a scheme is innovative with regard to its tenure and/or financial modelling, units will only be considered as part of the supply of affordable housing where rental or purchase rates are comparable to</u></p>

Change Reference Number	Policy, para	Type of change	Proposed change
			<u>affordable housing tenures set out within the Mayor's Housing Strategy. Financial contributions towards the provision of C3 affordable housing will only be appropriate for non-self-contained, sui generis schemes that are demonstrably not C3 or C2 accommodation, provided at discounts equivalent to the requirements of Policy H.2. Any future proposed change of use will trigger a full Viability Review to maximise affordable housing.</u> <u>Where the population density is above that of equivalent schemes and there are considered to be sufficient impacts on transport or infrastructure demand, further S106 contributions may also be sought for mitigation of impacts.</u>
C130	New para	Major	<b>Paragraph 5.52</b> <u>All proposals for new forms of residential accommodation should demonstrate that they make appropriate and effective use of the site and thus do not compromise overall housing delivery. They should meet all relevant internal and external space standards, or for non-self-contained scheme demonstrate how equivalent flexible space is provided to meet this requirement. Where the proposal also includes an element of supporting non-residential space or shared facilities there should be no unacceptable impacts on amenity on a site or neighbourhood level.</u>
C131	New para	Major	<b>Paragraph 5.53</b> <u>In accordance with the London Plan, generally any scheme which is non-self-contained and removes pressure of conventional supply will be monitored on a 3:1 basis; anything which frees up larger units will be monitored on a 1:1 basis.</u>
	Paragraph 5.32 – Community Infrastructure Including Schools	Reference update	<b>Become Paragraphs 5.54</b> ....Children's play space and open spaces are addressed within Policies BN.7 & 8 and BN.8 & 9 in Section 6 of this Local Plan.
	CI:1 Community Infrastructure	No change	CI:1 Community Infrastructure No change to policy proposed
	Paragraphs 5.33 and 34	No change	<b>Become Paragraphs 5.55 and 5.56</b>
C132	Paragraph 5.35	Minor	<b>Becomes Paragraph 5.57</b> There are also existing community facilities within the area <u>falling generally within D1 uses, but may also</u>

Change Reference Number	Policy, para	Type of change	Proposed change
			include <u>D2 venues of a specific community or cultural value</u> . With the significant population growth predicted and the need to ensure that new and existing communities have access to places where they can meet and where community activities can take place, these existing and new facilities are essential for long-term community development in the Legacy Corporation area. As such facilities will also generally be available for use by residents in the wider surrounding communities, these facilities will also play a part in a wider integration of communities in this part of east London, particularly as improved connections provide greater access and permeability across the Lower Lea Valley. <u>Therefore existing community facilities and venues will be protected through this policy</u> . The existing and proposed <u>D1</u> community facilities are shown at Figure 42 <u>11</u> opposite.
	Paragraph 5.36	No change	<b>Becomes Paragraph 5.58</b>
	CI.2: Providing new and retaining exhibiting community infrastructure	No change	CI.2: Providing new and retaining exhibiting community infrastructure  No change to policy proposed
	Paragraph 5.37	No change	<b>Becomes Paragraph 5.59</b>
C133	Paragraph 5.38	Minor	<b>Becomes Paragraph 5.60</b> While uncertainty exists as to the precise number of new school places that will be required within and around the Legacy Corporation area within the lifetime of this Local Plan, evidence indicates that there <u>will</u> <u>may</u> be a general deficit in the capacity of existing and currently planned schools, particularly for primary-age pupils.
C134	Paragraph 5.39	Minor	<b>Becomes Paragraph 5.61</b> <del>Uncertainty also exists around the number of children requiring school places that will be generated from the population living in the new development planned for the area. Initial assessment through the Infrastructure Delivery Plan indicates a requirement of 2,138 primary school places and 650 secondary school places in addition to the existing and planned supply during the Plan period to 2031. However, a more detailed study indicates that this figure could be lower. The existing schools in the area and the planned provision is set out in the tables 4 and 5.</del>

Change Reference Number	Policy, para	Type of change	Proposed change
			<p><u>Assessment through the Legacy Corporation Schools Study (2018) and Infrastructure Delivery Plan (2018) indicates an additional requirement for primary school places and secondary school places in addition to the existing and planned supply during the Plan period to 2036, in particular, for later in the Plan period. Monitoring will be required in order to determine the need more accurately within the second half of the Plan period when this possible deficit has the potential to occur. This will be reviewed as part of the Local Plan process within future Legacy Corporation Local Plan Reviews or by successor organisations. The Legacy Corporation will continue to work closely with local education authorities.</u></p>
C135	Paragraph 5.40	Minor	<p><b>Becomes Paragraph 5.62</b>  <del>However, a more detailed study indicates that this figure could be lower. The existing schools in the area and the planned provision are set out in the tables 4 5 and 5-6.</del></p>
C136	Table 4	Minor	<p><b>Becomes Table 5</b>  Existing and proposed schools tables updated to reflect current context, see table changes below.</p>
C137	Table 5		<p><b>Becomes Table 6</b>  Existing and proposed schools tables updated to reflect current context, see table changes below.</p>
C138	Paragraph 5.41	Minor	<p><b>Becomes Paragraph 5.63</b>  It is considered that the existing and planned schools as set out above are likely to provide sufficient school provision within the Legacy Corporation area <u>within at least the first half of the Plan Period</u>. However, depending on admissions criteria, the schools will <u>also</u> serve residents outside the Legacy Corporation area, and will also be part of the wider school networks in the surrounding area. <u>Schools planning will need to take into account the wider picture for school place planning within the four boroughs. The LLDC Schools Study (2018) provides information on this wider context. The Legacy Corporation in its role as Local Planning Authority will work with the boroughs to ensure that schools proposals meet long-term identified needs.</u> <del>New schools that are close to the area include School 21, a new all through free school at Rokeby Street, Stratford, and the relocated and expanded Bow School, a secondary school and sixth form located at Bow Locks, Bromley by Bow. It will therefore be necessary to monitor, and review school provision and population change over time to ensure provision keeps pace with need.</del> Schools will be</p>

Change Reference Number	Policy, para	Type of change	Proposed change
			encouraged to use the assets of Queen Elizabeth Olympic Park and economic growth within the Legacy Corporation area to inspire a generation of east Londoners to believe that, with the right support, ambition and determination, they can compete with the best of London and beyond.
C139	Paragraph 5.42	Deletion	<del>5.42 Although the tables above set out the existing and planned school provision, free school and other new school proposals are likely to come forward over time. Conversely, school allocations, where tied to specific development schemes, may not come forward, or could come forward sooner or later than currently anticipated, depending on the development cycle. It will therefore be necessary to monitor and review school provision and population change over time to ensure provision keeps pace with need.</del>
C140	Paragraph 5.43	Minor	<b>Becomes Paragraph 5.64</b> The Legacy Corporation will work to secure implementation of planned new provision. Also, where population statistics indicate that school place requirements are greater than planned, it will <u>work with the schools providers and local education authorities to seek to expand expansion of the</u> provision within existing and planned schools where capacity exists. <del>If evidence indicates that this further capacity is unlikely to be sufficient, delivery of additional new schools will be required later in the Plan period. At present, the site allocation at Greater Carpenters District allows for new or replacement schools to come forward as part of new development in that area.</del> When planning applications are considered in those <u>areas locations where existing and planned schools have been identified</u> , the impact on school places provision should be assessed and should inform proposals.
C141	Paragraph 5.44	Minor	<b>Becomes Paragraph 5.65</b> Sites for schools will need to be of sufficient size and in a location and form that meet the requirements of Policy CI.2. It is expected that new schools will be designed to meet or exceed the best practice standards current at the time. These are currently the <u>Baseline Designs for Schools: gGuidance</u> published by the <u>Education and Skills Funding Agency</u> in March 2014. <del>The introduction of university technical colleges, for 14 to 18-year olds, specialising in technical skills, is also likely to have an influence on form of provision.</del>



(Change Reference Number C136) Table ~~5~~ 4-Existing Schools Provision

Existing Schools	Area	Borough	Notes
Chobham Academy	East Village	Newham	All-through school, capacity for 1,800 students
London Academy of Excellence	Stratford High Street	Newham	Sixth-form college, free school
East London Science School	Three Mills	Newham	A free school in temporary accommodation, providing secondary education for up to 240 pupils <u>(relocating to nearby permanent, larger Stephenson Street site in early 2020's)</u>
Gainsborough Primary School	Hackney Wick	Hackney	Recently expanded to three-form entry
Carpenters Primary School	Stratford	Newham	Recently expanded to three-form entry, <u>in the future there may be the potential to redevelop and further expand this school as part of on-going regeneration in the area.</u>
<u>Bobby Moore Academy Primary School</u>	<u>Sweetwater</u>	<u>Tower Hamlets</u>	<u>Primary School opened in September 2018 for 60 reception places</u>
<u>Bobby Moore Academy Secondary School</u>	<u>Stadium Island</u>	<u>Newham</u>	<u>Secondary School opened in September 2018, 180 Year 7 places.</u>
<u>Mossbourne Academy Riverside Primary School</u>	<u>Hackney Wick, adjacent to Here East</u>	<u>Hackney</u>	<u>Three-form entry primary school</u>

Change Reference Number C137: ~~Table 6~~ 5-Planned Schools provision

Planned Schools	Secured Through	Site Allocation	Notes
<u>Secondary school at Rick Roberts Way, Stratford</u> <u>Potential for Primary School at Rick Roberts Way</u>	<u>Legacy Communities Scheme Planning Permission</u> No existing planning permission	SA3.6	<u>Identified in 2015 Local Plan as potential school site. May be required in second half of Plan Period. Requirement to be identified at the</u>

			<u>time based on monitoring of need.</u>
Hackney Wick, adjacent to Here East	Legacy Communities Scheme Planning Permission	SA1.7	Three-form entry primary scheduled to open in September 2015 or 2016
Fish Island East/Sweetwater	Legacy Communities Scheme Planning Permission	SA1.8	Three form entry primary school scheduled to open in September 2016
Bromley-by-Bow	No existing planning permission	SA4.1	Two-form entry primary school
<u>Sugar House Island</u>	<u>Existing planning permission REF: 12/00336/LTGOUT/LBNM</u>	<u>SA4.2</u>	<u>Two-form entry primary school</u>
Neptune Wharf	<u>Existing outline planning permission REF: 12/00210/OUT</u>	<u>SA1.64</u>	<u>Three-form entry primary school</u>

Change Reference Number C70: Figure 9: Housing Trajectory to 2036

